

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
 :
- v. - :
 :
YING SUN, :
JIAN WANG, :
FRANK LIU, :
DIELONG WU, :
LARRY LAI, :
JIE LIN, and :
STEVEN WOO, :
 :
Defendants. :
- - - - - x

SEALED INDICTMENT

21 Cr. _____

21 CRIM 343

COUNT ONE
(Conspiracy to Commit Money Laundering)

The Grand Jury charges:

OVERVIEW OF THE MONEY LAUNDERING ORGANIZATION

1. From at least in or about November 2019 through at least in or about May 2021, YING SUN, FRANK LIU, JIAN WANG, DIELONG WU, LARRY LAI, JIE LIN, and STEVEN WOO, the defendants, were members of a California-based money laundering organization and unlicensed money transmitting business (the "MLO") involved in receiving, transporting, and laundering millions of dollars in narcotics trafficking proceeds throughout the United States.

2. The operations of the MLO were largely coordinated by YING SUN, the defendant, who communicated with members of drug trafficking organizations ("DTOs") throughout the United States

and in Mexico for the purpose of arranging pickups by the MLO of large quantities of U.S. currency from the DTOs (the "Money Pickups"). From at least in or about April 2020 through in or about April 2021, SUN coordinated more than 130 completed Money Pickups involving a total of over approximately \$20 million in narcotics proceeds that took place in approximately 23 different states, including in the Southern District of New York.

3. JIAN WANG, FRANK LIU, DIELONG WU, LARRY LAI, JIE LIN, and STEVEN WOO, the defendants, and other known and unknown, worked as members of the MLO and furthered its operations primarily by, among other things, traveling around the United States to conduct Money Pickups from DTOs, transporting bulk currency, depositing narcotics proceeds into and/or withdrawing narcotics proceeds from retail bank accounts, and/or transferring narcotics proceeds to other individuals or entities. During the course of the investigation, law enforcement seized a total of over approximately \$6.5 million in connection with Money Pickups facilitated by members of the MLO, including WANG, LIU, WU, LAI, LIN, and WOO.

STATUTORY ALLEGATIONS

4. From at least in or about November 2019 through at least in or about May 2021, in the Southern District of New York and elsewhere, YING SUN, JIAN WANG, FRANK LIU, DIELONG WU, LARRY LAI, and JIE LIN, the defendants, and others known and unknown,

knowingly and intentionally did combine, conspire, confederate, and agree together and with each other to commit money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

5. It was a part and an object of the conspiracy that YING SUN, JIAN WANG, FRANK LIU, DIELONG WU, LARRY LAI, and JIE LIN, the defendants, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics distribution and conspiracy to commit the same, in violation of Title 21, United States Code, Sections 841 and 846, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Sections 1956(h).)

COUNT TWO
**(Conspiracy to Operate an Unlicensed
Money Transmitting Business)**

The Grand Jury further charges:

6. The allegations contained in paragraphs one through three of this Indictment are repeated and realleged as if fully set forth herein.

7. From at least in or about November 2019 through at least in or about May 2021, in the Southern District of New York and elsewhere, YING SUN, JIAN WANG, FRANK LIU, DIELONG WU, LARRY LAI, JIE LIN, and STEVEN WOO, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

8. It was a part and an object of the conspiracy that YING SUN, JIAN WANG, FRANK LIU, DIELONG WU, LARRY LAI, JIE LIN, and STEVEN WOO, the defendants, and others known and unknown, knowingly conducted, controlled, managed, supervised, directed, and owned all and part of an unlicensed money transmitting business affecting interstate and foreign commerce, to wit, SUN, WANG, LIU, WU, LAI, JIN, and WOO conducted a business used to transfer money on behalf of the public within the United States, including to and from the Southern District of New York, which

business (a) was operated without an appropriate money transmitting license in a State, where such operation is punishable as a misdemeanor or a felony under State law, to wit, among other States, Arizona, California, Georgia, Maryland, New York, North Carolina, Ohio, Pennsylvania, and Tennessee; (b) failed to comply with the money transmitting business registration requirements set forth in Title 31, United States Code, Section 5330, and the regulations prescribed thereunder; and (c) involved the transportation and transmission of funds that were known to the defendants to have been derived from a criminal offense and were intended to be used to promote and support unlawful activity, in violation of Title 18, United States Code, Section 1960.

OVERT ACTS

9. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. From on or about April 28, 2020 through on or about May 4, 2020, DIELONG WU, the defendant, conducted approximately 11 Money Pickups of a total of over approximately \$1 million arranged by YING SUN, the defendant, in or around the Bronx, New York, Staten Island, New York, and Philadelphia, Pennsylvania.

b. On or about May 4, 2020, WU passed a bag containing bulk currency that WU had received during the Money Pickups described in paragraph 9(a) above to JIE LIN, the defendant, in or around Mt. Laurel, New Jersey. Law enforcement seized over approximately \$300,000 from LIN and another individual as they attempted to deposit the money at a retail bank.

c. On or about May 26, 2020, STEVEN WOO, the defendant, conducted a Money Pickup of approximately \$140,000 arranged by SUN in or around Baltimore, Maryland.

d. From on or about June 29, 2020 through on or about June 30, 2020, LARRY LAI, the defendant, conducted approximately four Money Pickups of a total of approximately \$190,000 arranged by SUN in or around Queens, New York.

e. On or about July 17, 2020, JIAN WANG and FRANK LIU, the defendants, attempted to conduct a Money Pickup arranged by SUN in or around the Bronx, New York, but the Money Pickup was not completed because law enforcement seized approximately \$299,955 from the DTO customer before the money could be delivered to WANG and LIU.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATIONS

10. As a result of committing the offenses alleged in Counts One and Two of this Indictment, YING SUN, JIAN WANG,

FRANK LIU, DIELONG WU, LARRY LAI, JIE LIN, and STEVEN WOO, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offenses, and any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offenses and the following specific property:

a. \$153,731 in United States currency seized from inside 144-20 38th Avenue, Queens, New York on or about April 10, 2020;

b. \$60,000 in United States currency seized from an individual in front of 144-20 38th Avenue, Queens, New York on or about April 10, 2020;

c. \$300,020 in United States currency seized from an individual at the intersection of Bowne Street and Roosevelt Avenue in Queens, New York on or about April 10, 2020;

d. \$2,726,075 in United States currency seized inside 461 Southard Street, Trenton, New Jersey on or about April 16, 2020; and

e. \$41,633 in United States currency seized inside 461 Southard Street, Trenton, New Jersey on or about April 16, 2020.

Substitute Asset Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853(p); and
Title 28, United States Code, Section 2461(c).)



FOREPERSON



AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

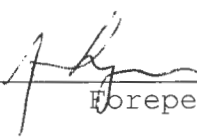
YING SUN,
JIAN WANG,
FRANK LIU,
DIELONG WU,
LARRY LAI,
JIE LIN, and
STEVEN WOO,

Defendants.

SEALED INDICTMENT

(18 U.S.C. §§ 1956 and 371.)

AUDREY STRAUSS
United States Attorney


Foreperson
